

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

STEPHEN KEEFE,)
Plaintiff)
)
v.)
)
LOCAL 805, INTERNATIONAL)
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,)
LOCAL 800, INTERNATIONAL)
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,)
and LOCAL 799, INTERNATIONAL)
LONGSHOREMEN'S ASSOCIATION, AFL-CIO,)
Defendants)
)

**DEFENDANTS' LOCAL 805, 800, 799, INTERNATIONAL LONGSHOREMEN'S
ASSOCIATION, AFL-CIO's PROPOSED VOIR DIRE**

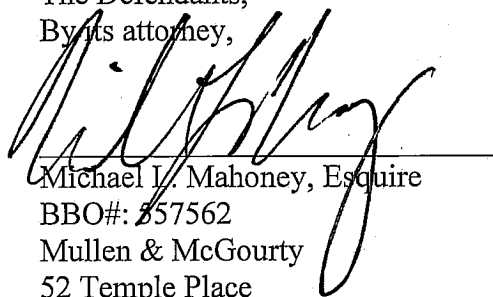
Defendants' Local 805, 800, 799, International Longshoremen's Association, AFL-CIO
request that the following questioning be asked of prospective jurors:

1. This case arises out of a dispute between a member of a Longshoremen's Union and three Locals of the Longshoremen's Union. The Plaintiff, Stephen Keefe, alleges that the Defendants improperly suspended him as a result of the Plaintiff previously filing a law suitability determination against the same Locals. The Defendants deny this allegation. Would such subject matter impede your ability to render a fair and impartial verdict for either party?
2. Are you related to either party or attorney in this case?
3. Do you or any member of your family have an interest in the case?
4. Have you or any member of your family ever been a member in a union?

5. Have you or any member of your family ever been an officer in a union?
6. Have you or any member of your family ever been a member of the Longshoremen's Union?
7. Have you or any member of your family ever held an officer position in the Longshoremen's Union?

Dated: November 13, 2007

Respectfully submitted,
The Defendants,
By its attorney,

A handwritten signature in black ink, appearing to read "Michael L. Mahoney", is written over a horizontal line.

Michael L. Mahoney, Esquire
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